

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – DETROIT**

In re:

Roxi A. Yaldoo,

Chapter 13

Case No. 12-67025

Honorable Marci B. McIvor

Debtor.

**RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

Debtor, through his attorneys, WOLFE LAW GROUP, PLLC, by Jack B. Wolfe, Esq., responds to Movant's Motion for Relief from the Automatic Stay, as follows:

1.-5. Admitted.

6. Deny as untrue as In re Glenn is conditioned by 11 U.S.C § 1322(c)(1), which allows Debtor to confirm a plan and cure any deficiency if the sheriff's sale was not in accordance with non-bankruptcy law and, in the instant case, Movant is a federal instrumentality/entity that neither it nor its agents and/or servicers could use non-judicial foreclosure to obtain title to the home as it violated the constitutional rights of Debtor to a due process hearing to contest and protest the valuation and it also violated MCL § 600.3228, MCL §§ 600.3204(1)(d) and (3).

7. Admit; however, as set forth above, this did not occur.

8. Deny as untrue. Approximate value is less than \$150,000.00.

9. Admit.

10. Admit.

11. Deny as untrue.

12. Deny as untrue. See 11 U.S.C. § 362(l).

13.-15. Admit

16. Deny as untrue and Debtor reserves the right to amend this Response and provide a supplemental briefing.

17. Admit.

WHEREFORE, Debtor requests that this Court deny the motion of Movant.

Respectfully submitted,

WOLFE LAW GROUP, PLLC

By: /s/ Jack B. Wolfe  
JACK B. WOLFE (P39667)  
Attorneys for Debtor  
7071 Orchard Lake Road, Suite 250  
West Bloomfield, MI 48322  
(248) 862-2018 (w)  
(248) 862-2026 (f)  
(248) 228-6307 (m)  
[thewolfelawgroup@yahoo.com](mailto:thewolfelawgroup@yahoo.com)

Dated: January 4, 2013

**CERTIFICATE OF SERVICE**

Jack B. Wolfe certifies that on January 7, 2013, he filed a copy of the foregoing response to motion to lift stay using the ECF filing system, which will send notification of such filing to all counsel and parties of record.

/s/ Jack B. Wolfe  
Jack B. Wolfe